



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 31 2012

REPLY TO THE ATTENTION OF:

Steve Weis
Michigan Department of Environmental Quality
Air Quality Division - Detroit District Office
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202

Dear Mr. Weis:

Thank you for the opportunity to provide the Michigan Department of Environmental Quality (MDEQ) our comments on the draft Renewable Operating Permit (ROP) for Carmeuse Lime, Inc. (Permit Number MI-ROP-B2169-201X). On Wednesday, October 24, 2012, my staff held a conference call with you to discuss our comments, and on October 26, 2012, you provided us with a response to those comments. Below is a summary of our comments and your responses:

EPA's Comments

1. Special Condition (SC) VI.2 on pages 17, 19, 21, 23, and 25 of the draft ROP indicates a weekly pressure drop reading as a monitoring requirement, but doesn't define what an excursion from the normal range is.
2. On page 28, certain monitoring methods appear to be mislabeled, as the material limit restriction on glycerin refers to a monitoring condition for lime, and the restriction on syngas refers to monitoring conditions for limestone feed rate and BTU/hr heat input rates. Additionally, SC II.6 applies to syngas but refers to a monitoring condition for the coal consumption rate. Finally, SC VI.10 is referenced on page 29, but the condition does not exist in the permit. Please clarify whether these references and/or conditions should be revised.
3. EPA recommends that lime kilns with a Fabric Filter (FF) "maintain and operate the FF such that the bag leak detection system or particulate matter alarm condition does not exist for more than 5 percent of the total operating time in a 6-month period" to comply with 40 CFR 63.7090(b) (Table 2 to Subpart AAAAA of Part 63-Operating Limits). The draft ROP indicates on page 29 that "the permittee shall maintain the positive pressure reverse air baghouse such that the 6 minute average opacity for any 6 minute block period does not exceed 15 percent" instead of. Please justify why this option is most appropriate at the facility.

4. SC III.8 on page 30 only mentions "coal, syngas and/or glycerin fuels" as permissible fuels for the kilns. Is natural gas permitted as syngas under this condition?
5. In the Public Notice document, there is an error message at the bottom of the page: "Persons needing accommodations for effective participation at the public hearing, if held, should contact **Error! Reference source not found** at the District Office referenced above a week in advance to request mobility, visual, hearing, or other assistance." Please correct this error so that it is made clear who persons needing accommodations should contact.

MDEQ's response

1. MDEQ was able to find the electronic glitch within the public notice document that was causing the error to display.
2. Regarding the alternative fuels (syngas and glycerin) described in the Flexible Group Table, MDEQ updated the Monitoring/Test Method columns on pages 28 and 29 to reference special conditions under section VI (Monitoring/Recordkeeping) that were missing from the version of the permit that appeared on the website. MDEQ explained that an earlier version of the draft ROP was posted. One thing that was different from the final version was the omission of the Recordkeeping/Monitoring special conditions that were carried over from the most recently issued Permit to Install (PTI) for Carmeuse. The PTI, which addressed the introduction of the alternative fuels for use at the facility, was issued this Spring.
3. MDEQ added the reference to natural gas in Special Condition III.8.
4. Regarding the monitoring of the pressure drop across the baghouse, the conditions in the Flexible Group table that reference an Operations, Maintenance and Monitoring (OM&M) Plan and Continuous Parameter Monitoring System (CPMS) are meant to cover this issue. These requirements are found in the Lime Manufacturing maximum achievable control technology standard, and while not specific, they require the permittee to develop a plan and to present it, in writing, to MDEQ. In its ROP renewal application, Carmeuse proposed weekly pressure drop readings. MDEQ commits to reminding the permittee to update MDEQ regarding the OM&M plan, and to ensure that the CPMS elements are being adequately addressed, including a description as to how pressure drops are measured across their baghouse and any other applicable control equipment and the frequency and actions associated with this monitoring.

We would like to thank you again for working with us in making sure that these issues were resolved prior to permit issuance. If you have any further questions, please feel free to contact Beau Garrett, of my staff at (312) 353-4824, or Constantine Blathras at (312) 886-0671.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the printed name and title.

Genevieve Damico
Chief
Air Permits Section